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April 25, 2023

**Via ECF and E-mail**

Hon. Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

**MEMO ENDORSED**

**Re: *In re Tether and Bitfinex Crypto Asset Litigation, 19-CV-09236 (KPF)* –  
Letter Motion to File Redacted Exhibits Under Seal**

Dear Judge Failla:

We represent Plaintiffs in the above-referenced action. Pursuant to Rule 9 of this Court's Individual Rules of Practice in Civil Cases, we write to request permission to file Plaintiffs' April 25 letter opposing B/T Defendants' request for a Local Civil Rule 37.2 conference ("Plaintiffs' Response Letter") in redacted form and Exhibits 1-4 to Plaintiffs' Response Letter under seal.

The redacted information in Plaintiffs' Response Letter and the information under seal in Exhibits 1-4, contain information that has been designated as Confidential or Attorneys' Eyes Only by Defendants pursuant to this Court's Protective Order. ECF No. 151, at ¶ 3. Plaintiffs do not object to the characterization of these exhibits and related redacted information as Confidential or Attorneys' Eyes Only for the limited purposes of this filing.

Accordingly, Plaintiffs respectfully request leave to file Plaintiffs' Response Letter in redacted form, and Exhibits 1-4 under seal, to avoid any improper disclosure of information Defendants have designated as Confidential or Attorneys' Eyes Only. *See* ECF No. 151, at ¶ 4.b.

Hon. Katherine Polk Failla  
April 25, 2023

Respectfully submitted,

/s/ Andrew R. Dunlap

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*Interim Lead Counsel and Attorneys for  
Plaintiffs and the Proposed Class*

Application GRANTED.

The Clerk of Court is directed to terminate the pending motion at docket entry 335.

Dated: April 26, 2023  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE